

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CATHERINE CALHOUN,

Plaintiff,

vs.

METROPOLITAN LIFE INSURANCE
COMPANY,

Defendant.

NO.

COMPLAINT FOR LONG TERM
DISABILITY BENEFITS

COMES NOW plaintiff, Catherine Calhoun, with a complaint for Long-Term Disability benefits and states and alleges as follows:

I. IDENTIFICATION OF PLAINTIFF

1.1 At all times material herein, plaintiff was resident of Pierce County, Washington, and was a beneficiary, participant and insured under a Long Term Disability plan covered by the Employee Retirement Income Security Act of 1974 (ERISA).

II. IDENTIFICATION OF DEFENDANT

2.1. At all times material herein, defendant, Metropolitan Life Insurance Company, administered an employee welfare benefit plan governed by ERISA. The Plan is sponsored by plaintiff's employer Boy Scouts of America. Benefits under the Plan are funded through an insurance policy with defendant, Metropolitan Life Insurance Company, under Group Policy No. 1136003 - G.

2.2 Washington law controls the Group Policy.

III. FACTS

3.1 Plaintiff made application for Long-Term Disability benefits under the Plan with defendant, Metropolitan Life Insurance Company, with a cease work date of August 31, 2016.

3.2 On October 12, 2017, defendant, Metropolitan Life Insurance Company, completed review of plaintiff's claim and denied benefits.

3.2 Plaintiff has exhausted her administrative remedies.

IV. CAUSE OF ACTION

4.1 Plaintiff brings this action under 29 U.S.C. § 1132(a)(1)(B) to recover Long-Term Disability benefits under an employer sponsored welfare plan.

V. RELIEF REQUESTED

5.1 Plaintiff requests that this Court order entitlement to Long-Term Disability benefits with payment of benefits that have accrued, award of attorney fees and costs, and any other relief the court deems just and equitable in the premises.

5.2 Plaintiff requests that this court require defendants to answer this complaint and supply the court with copies of the administrative record, the Summary Plan Description, and the applicable insurance policy.

DATED this 8th day of February, 2018.

TODD R. RENDA, ATTORNEY AT LAW

s/Todd R. Renda

Todd R. Renda WSBA# 20779

Attorney for plaintiff

6314 19th St. West, Ste 21

Tacoma WA 98466-6223

Telephone: 253-566-6701

FAX: 253-565-0705

toddrenda@msn.com

mrenda@yahoo.com